

UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MICHAEL DOMANN, et al.,	:	Case No. 1:22-CV-2243
	:	
Plaintiffs,	:	Judge Bridget Meehan Brennan
vs.	:	
	:	PLAINTIFFS' RULE 26(a)(1)(A)
FRONTIER AIRLINES, INC., et al.,	:	INITIAL DISCLOSURES
	:	
Defendants.	:	

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), Plaintiffs herein submit their Initial Disclosures.

i. Individuals likely to have discoverable information:

1. Michael Domann, Plaintiff
233 Mallard Lane
Dayton Beach, FL 32119
Incident, injury, loss, and damages
2. Mary Jo Domann, Plaintiff
233 Mallard Lane
Dayton Beach, FL 32119
Effect on marriage and home life
3. Mary Ann Cline, R.N., Life Care Planner
ProMedica Verity Group
25001 Emery Road, Suite 300
Cleveland, Ohio 44128
4. Brian Ruess, M.D.
Orlando Orthopaedic Center
25 W. Crystal Lake Street
Orlando, FL 32806

Plaintiff's M.D.'s are various; to be identified at the Cleveland Clinic, University Hospitals of Cleveland.

ii. Description of Documents:

None at present

iii. Computation of Damages:

1. accommodation of current disability with additional assistance by Life Care plan and economic evaluation. Future disability subject to high risk surgical intervention.
2. Surgery to address torn rotator cuff estimate.
3. Discomfort, pain and suffering from additional disability.
4. Additional accommodation if surgery is not effective, electric wheelchair.
5. Consortium claim in addition to and in lieu of additional assistance.

iv. Insurance Agreement(s):

Not applicable.

Respectfully submitted,

/s/ Edgar H. Boles

EDGAR H. BOLES (0003885)

/s/ Michael P. Cassidy

MICHAEL P. CASSIDY (001087)

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of March 2024 *Plaintiffs' Rule 26(a)(1) Initial Disclosures* were filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and emailed to Defendants counsel. Parties may access this filing through the Court's ECF system.

/s/ Edgar H. Boles

EDGAR H. BOLES (0003885)

Counsel for Plaintiffs